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December 22, 1997

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

Re: *Application of Electric Power Board of Chattanooga for a
Certificate of Public Convenience and Necessity to Provide
Intrastate Telecommunications Services*

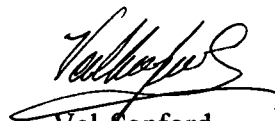
Docket No: 97-07488

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Statement of Issues on behalf of AT&T Communications of the South Central States, Inc. pursuant to the "Notice of Pre-hearing Conference."

Copies are being served on parties of record.

Yours very truly,


Val Sanford

VS/ghc
Enclosure

cc: All Parties of Record
James P. Lamoureux, Esq.
Garry Sharp

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

*In Re: Application of Electric Power Board of Chattanooga for a
Certificate of Public Convenience and Necessity to Provide
Intrastate Telecommunications Services*

Docket No: 97-07488

**STATEMENT OF ISSUES ON BEHALF OF AT&T COMMUNICATIONS
OF THE SOUTH CENTRAL STATES, INC.**

Pursuant to the "Notice of Pre-hearing Conference" dated December 15, 1997, AT&T Communications of the South Central States, Inc. respectfully submits the following statement of issues to be addressed in this case:

1. To what extent, and by what authority, is the Chattanooga Electric Power Board "independent" of the City of Chattanooga, as stated in the Application?
2. Does the City of Chattanooga require telecommunications service providers operating within its limits to obtain franchises or rights-of-way agreements from the City and pay to the City, fees, rentals or other charges?
3. Insofar as the requirements of the City of Chattanooga are concerned, what will be the difference, if any, between what is required of the Chattanooga Electric Power Board and investor-owned telecommunications service providers operating within its limits?
4. Are the limitations imposed on the Chattanooga Electric Power Board by its wholesale power contract with the Tennessee Valley Authority enforceable by anyone other than the TVA, or otherwise adequate to meet the limitations imposed by Chapter 531 of the Public Acts of 1997 and of T.C.A. §65-5-208(c)?
5. How does the Chattanooga Electric Power Board propose to comply with the requirements of Section 5 of Chapter 531 of the Public Acts of 1997?

6. How does the Chattanooga Electric Power Board propose to comply with the requirements of Section 6 of Chapter 531 of the Public Acts of 1997?

7. To what extent will the Chattanooga Electric Power Board jointly market, or otherwise collaborate in the offering of, its telecommunications and its power services and should limitations be placed on such joint marketing or other collaboration?

8. Is the City of Chattanooga or the Chattanooga Electric Power Board in the issuance of evidences of indebtedness subject to the provisions of T.C.A. §65-4-109?

9. In view of the position of the Chattanooga Electric Power Board as a municipally owned, monopoly provider of electric power services, should the TRA impose special accounting, cost allocation, reporting, marketing and tariff requirements in order to assure compliance with T.C.A. §65-5-208(c)?

10. Should the power of the Chattanooga Electric Power Board over pole attachments be considered by the TRA in determining the criteria necessary to assure compliance with T.C.A. §65-5-208(c)?



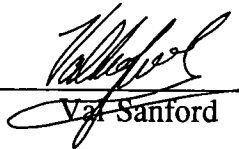
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Attorneys for Petitioner, AT&T Communications
of the South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that I served a copy of the foregoing Statement of Issues on behalf of AT&T Communications of the South Central States, Inc. on the the parties of record by depositing a copy of the same in the United States mail, postage paid, addressed as follows, this December 22, 1997.


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